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May 26, 2009

J. Foster Wallace

711 Gaffney Road, Suite 202

Fairbanks, AK 99701

Re: *Proberts', et. al. v. FCSA, et. al.* 4:06-cv-30 RRB

Dear Foster,

I have spent some time trying to coordinate the state of discovery on this case. It is in the attached discovery table. It appears that you owe us items the highlighted items.

Am I to understand you correctly that you will be answering all of these on June 5, 2009? If not, please explain.

Additionally, we do not have the numbers FCSOA 01066 - 01202. Have these been produced and we misplaced them; or have we never received them? If they are materials that we have received but may have been received unnumbered, please let us know.

Sincerely,

THE LAW OFFICE OF KENNETH L. COVELL

A handwritten signature in black ink, appearing to read "K. L. Covell". The signature is fluid and cursive, with the first and last names being more prominent than the middle initial.

Kenneth L. Covell

KLC/ymt

Probert v. FCSA 4:07-cv-30 RRB
Discovery Table

DATE	REQUEST	DATE	REPLY	FCSOA
10/30/07	Interrogatory	01/10/08	Answers to Plaintiff's Discovery Request of October 24, 2007	Un-numbered
N/A	N/A	06/08/08	Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures	00001 - 00358
N/A	N/A	07/23/08	First Supplement to Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures	00359 - 00419
03/19/08	Discovery Requests of 3/19/2008	07/21/08	Responses to Plaintiffs' Discovery Requests of 3/19/2008	00420 - 01065
01/29/08	Discovery Request to Defendant, FCSA, January 2009	04/01/09	Letter: Foster to Ken	01203 - 01212
01/29/09	Second Discovery Request to Defendant, FCSA, January 2009			
03/20/09	Production Requests to Defendant, FCSA, March 2009			
03/20/09	Second Interrogatories to Defendant, FCSA, March 2009			
04/09/09	Discovery Requests to Defendant FCSA (April 9, 2009)			
04/15/09	Interrogatories to Defendant FCSA (April 15, 2009)			
04/17/09	Plaintiffs' First Request for Admission			
N/A	N/A	04/22/09	Second Supplement to Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures	01213 - 01492
N/A	N/A	04/29/09	Third Supplement to Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures	01493 01605

FCSOA

- 00001 - 00358 Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures
- 00359 - 00419 First Supplement to Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures
Personnel Files for Donna Grimes and John Grimes
- 00420 - 00450 Responses to Plaintiffs' Discovery Requests of 3/19/2008
Personnel Action Forms for Robert & Loretta Probert, Donna & John Grimes and Gene & Sandra Grissom
- 00451 - 00602 Responses to Plaintiffs' Discovery Requests of 3/19/2008
Billing history for each plaintiff
- 00603 - 00729 Responses to Plaintiffs' Discovery Requests of 3/19/2008
Earnings and Deductions Statements for Robert & Loretta Probert, Donna & John Grimes and Gene & Sandra Grissom
- 00730 - 01058 Responses to Plaintiffs' Discovery Requests of 3/19/2008
Time Records/Time Sheets for Robert & Loretta Probert, Donna & John Grimes and Gene & Sandra Grissom
- 01059 - 01063 Responses to Plaintiffs' Discovery Requests of 3/19/2008
Regitano memo.
- 01064 - 01065 Responses to Plaintiffs' Discovery Requests of 3/19/2008
Redacted Client Rehabilitation Service Note
- ~~01066 - 01202~~
- 01203 - 01212 Letter: Foster to Ken (April 1, 2009)
- 01213 - 01492 Second Supplement to Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures
Employment Records of Kenneth McDaniels and Leona McDaniels
- 01493 - 01605 Third Supplement to Family Centered Services of Alaska, Inc.'s Civil Rule 26 Initial Disclosures
Employment Records and Timesheets of Eric and Debra Cloninger